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UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION

MELISSA JENNINGS and  
DEBBIE KELLER,

Plaintiffs,

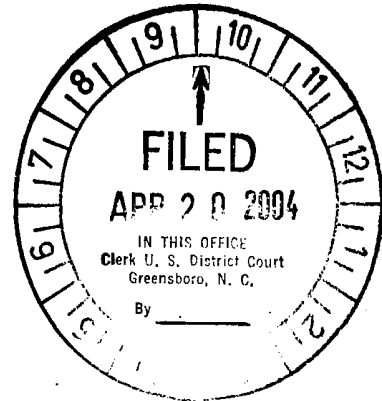
vs.

ORIGINAL

No. 1:99 CV 400

UNIVERSITY OF NORTH CAROLINA )  
at CHAPEL HILL, ANSON )  
DORRANCE, individually and as )  
Women's Soccer Coach at UNC, )  
WILLIAM PALLADINO, )  
individually and as Assistant )  
Women's Soccer Coach at UNC, )  
CHRIS DUCAR, individually )  
and as Assistant Women's )  
Soccer Coach at UNC, BILL )  
PRENTICE, individually, and )  
As former Chancellor at UNC, )  
SUSAN EHRLINGHAUS, )  
individually and as Assistant )  
To the Chancellor at UNC, )  
RICHARD A. BADDOUR, )  
individually and as Director )  
of Athletics for UNC, BETH )  
MILLER, individually and as )  
Senior Associate Director of )  
Athletics at UNC, JOHN )  
SWAFFORD, individually and as )  
Former Director of Athletics )  
for UNC, )

Defendants.



1                   The discovery deposition of ~~Joseph~~ [SIC]  
2 ~~Pennacchie~~, taken before Deborah A. Bridges,  
3       Certified Shorthand Reporter, at 1035 South York  
4       Road, Suite 105, Elmhurst, Illinois, commencing at  
5       10:15 a.m. on the 11th day of September, A.D.,  
6       2002.

7  
8       **APPEARANCES:**

9                   MR. LOUIS VARCHETTO,  
10                  MR. ANDREW R. POYTON  
                  (Mulherin, Rehfeldt & Varchetto)  
11                  211 South Wheaton Avenue  
                  Wheaton, Illinois 60187  
12                  630-653-9300

                  Appeared on behalf of the Plaintiff;

13  
14                  NORTH CAROLINA DEPARTMENT OF JUSTICE  
15                  MR. THOMAS J. ZIKO  
                  113 W. EDENTON STREET  
16                  RALEIGH, NC 27603-1013  
                  919-716-6920

17                  Appeared on behalf of the Defendants.  
18  
19  
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21  
22  
23  
24

## I N D E X

## WITNESS

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\* \* \*

1           Q           Was that the first time you had read  
2 your father's letters?

3           A           Yes. He had told me he had written  
4 letters, but pretty much kept them.

5           MR. VARCHETTO: You are going to have to  
6 keep your voice up loud, because everything you  
7 say she is writing down.

8 BY MR. ZIKO:

9           Q           So that was the first time you read  
10 the letters; is that right?

11          A           I believe so, yes.

12          Q           And your father read the letters to  
13 you before?

14          A           He had told me he had written  
15 letters to the university, gave me a brief summary  
16 of what he had covered, but figured that it was  
17 his correspondence. I had told him situations  
18 that were happening with Anson and things that he  
19 had said at practice, things that were going on  
20 with the money, and then he said, "Okay, let me  
21 take care of this." He wanted to go through the  
22 right avenues, writing letters to the university,  
23 stating his complaint. I had gone in and stated  
24 my complaints, you know, went and talked to her.

1 I had been encouraged by Ehringhaus tried to  
2 resolve these matters, and this would be the fall  
3 of '96, my freshman year, to go and resolve these  
4 matters with Anson myself.

5 Q Let me cover some other things.  
6 What is your current address?

7 A 5N096 Oak Court, St. Charles,  
8 Illinois, 60175.

9 Q Are you currently employed?

10 A Yes, I am.

11 Q What do you do?

12 A I'm a preschool teacher and  
13 enrichment teacher and I also coach.

14 Q And do you have a college degree?

15 A Yes, I do. I have a University of  
16 North Carolina undergraduate degree and a bachelor  
17 of fine arts in studio art and photography and I  
18 have a masters degree from Aurora University in  
19 teaching.

20 Q When did you get your degree from  
21 UN?

22 A My degree was 2000.

23 Q When did you get your masters?

24 A 2002.

1           A           No.

2           Q           I was the first girl to cross over  
3 with playing with the boys. Because you can't  
4 play for your high school and play for club at the  
5 same time because they conflict. Girl's -- boy's  
6 soccer is now, girl's are in the spring, so when  
7 girl's -- high school's in the spring, they play  
8 club in the fall. When they play -- does that  
9 make sense? So it is opposite seasons. So club  
10 season is in the spring. High school season is in  
11 the fall. Illinois is one of the few states where  
12 girls and boys play at different times of the  
13 year.

14          Q           What was the name of the team you  
15 played for?

16          A           Sockers, S-o-c-k-e-r-s F.C., F.C.  
17 Sockers, there is an S on the end.

18          Q           And during the summer of 1994, what  
19 team did you play for?

20          A           Summer of '94. That would have been  
21 Sockers.

22          Q           And which team did you play for in  
23 the fall of 1994?

24          A           I was playing -- I was playing

1 varsity tennis. Not varsity, playing the tennis  
2 at the high school; I played varsity my senior  
3 year.

4 Q So you weren't playing soccer in the  
5 fall of '94?

6 A No, I was doing tennis.

7 Q What soccer team did you play for in  
8 the spring of '95?

9 A That would have been Sockers again.

10 Q And was it the boy's team again?

11 A Yes, it is the boy's.

12 Q Same team you made before?

13 A Yes, I played with them up until I  
14 graduated high school.

15 Q What year was that?

16 A I graduated high school in '94.

17 Q Did you ever play for your high  
18 school team?

19 A No, I did not.

20 Q Was your high school private high  
21 school?

22 A No, it was not. It was public.

23 Q How big a high school was it?

24 A I graduated with a class of 628

1 Anson was a different person. Debbie slipping  
2 away from him, he totally changes his personality.  
3 He knows who does the drugs, he knows who has the  
4 drinking problem, he knows who has the eating  
5 disorders. And if you don't support him, then he  
6 holds it over your head. Anson is very  
7 manipulative. He enjoys degrading, humiliating --  
8 he thinks it is joking, jest or fun, but I don't  
9 know too many other people who would find it --  
10 some girls find it flattering, a lot of people  
11 find it disgusting; commenting about girls breast  
12 size, commenting about who they are shacking up  
13 with, wanting to know whether, you know, who  
14 Aubrey's fuck-of-the-hour is. Anson throws the  
15 fuck word around a lot.

16 Q Anything else?

17 A Yes, there is a lot more.

18 Q Tell me.

19 A Do you want specific incidents of  
20 stuff that happens at practices, stuff that would  
21 -- where would you like me to start?

22 Q Well, let's go back where I started,

23 [REDACTED]

24 What was it [REDACTED] told you



1           A       No.

2           Q       Did he ever say anything to you  
3 about wearing spandex?

4           A       No.

5           Q       Did he ever make any comments  
6 whatsoever to you about your body?

7           A       Not about my body, but he asked me  
8 in a closed-door meeting who I am fucking, wanting  
9 to know -- as soon as I put opposition, saying,  
10 "Well, you know, your dad is not here, you are far  
11 from home, I'm your father figure. You can rely  
12 on me. Tell me these types of things. It is okay  
13 to confide in me." I was 17 when he asked me that  
14 in a dark hotel room, knee-to-knee, bed not made,  
15 sitting at one those of tiny tables, and then as  
16 soon as I present opposition of, "Well, your stats  
17 aren't holding up, you need to improve or you're  
18 off. You're not doing what you need to do.  
19 You're grades aren't doing well."

20                   Well, when you are getting a  
21 constant thing of getting asked who you are  
22 fucking, that is a little off kilter.

23           Q       Who is [REDACTED]?

24           A       She was a freshman when I was a

1           Q       And when you heard her say these  
2 things, it was after practice?

3           A       After practice, somewhere after  
4 practice, somewhere at that -- you know, we are  
5 stretching, warming up.

6           Q       What is that? What are you talking  
7 about there?

8           A       It would be putting shoes on,  
9 stretching. There was -- you know, we would be  
10 together as a group.

11          Q       And where would this be?

12          A       On the practice field, which is  
13 across from the -- I don't know what this road is  
14 called. It is where the trailer is at or the  
15 trailer -- there used to be a trailer there.

16          Q       And what would happen during those  
17 times?

18          A       What do you mean, when he was --

19          Q       What was the team doing?

20          A       Getting ready for practice.

21          Q       Doing what?

22          A       Putting our stuff on, warming up,  
23 going for a jog, coming back, stretching. We  
24 would all sit and stretch there together. Goal

1 keepers would eventually -- field persons would do  
2 their thing; goal keepers would go do our thing.

3 Q And is that when these comments were  
4 made?

5 A Usually when we were putting our  
6 stuff on, before we set off to go for our jog.  
7 When we were sitting stretching, after going, you  
8 know -- we had to do a tour of the field.

9 Q Now, you've said you heard [REDACTED]  
10 [REDACTED] make comments about things that Anson said to  
11 her; is that correct?

12 A Yes. It would be -- just upsetting  
13 comments. Her getting mad that he would say  
14 something like that.

15 Q When you say --

16 A "I can't believe he would say  
17 something like that," you know, crying.

18 Q Is that a quote from her?

19 A You could say it is a direct quote.  
20 "I can't believe he would go" -- yes.

21 Q When she said --

22 A She didn't look happy to me when she  
23 said that.

24 Q Okay. When she said that, do you

1 know what she was talking about?

2 A It was directly after his comment,  
3 so it would have to be -- how could it not be  
4 related to that?

5 Q And this was during the stretching  
6 time, before practice?

7 A It is before practice, yes.

8 Q When all the --

9 A All --

10 Q -- women were there? So if someone  
11 had heard this, you would have -- other people  
12 would have heard it?

13 A Yes.

14 Q And was it directed to you?

15 A No.

16 Q And, in fact, you didn't participate  
17 in any of those discussions during stretching and  
18 practice, did you?

19 A With Anson?

20 Q Yes.

21 A I felt uncomfortable, filthy and  
22 humiliated. I didn't want to. You don't want to.  
23 If you -- you are safe if you stay out of radar.

24 Q So --

1           A           You don't get -- you get spared the  
2 humiliation, the degrading, the filthy comments,  
3 if you stay under radar.       It is survival.

4           Q           So I take it from your answer that  
5 you did not participate in any of those comments?

6           A           No.

7           Q           And Anson never said anything to you  
8 about this, your dimples or your legs or your  
9 breasts?

10          A           No.

11          Q           And he never said anything to you,  
12 to make you out to be the team slut?

13          A           No.

14          Q           In fact, he never said anything to  
15 you of a sexual nature ever, did he?

16          A           He did. Just not at that same time  
17 he would be picking on [REDACTED]. He asked me who I  
18 was fucking in his hotel room, is a little off  
19 keel.

20                      Any time that discussion situation  
21 came around, I would take myself as far away from  
22 that situation as possible. I didn't want to be a  
23 part of it.

24          Q           During this time where the team was

1 they were trying to find out what I had -- find  
2 out about what my weekend was, and what I had done  
3 going to see my boyfriend.

4 Q But you didn't tell them anything,  
5 did you?

6 A No.

7 Q And to the best of your knowledge,  
8 they knew nothing, right?

9 A Yes.

10 Q Is [REDACTED] your boyfriend's name?

11 A At that time.

12 Q What was his name?

13 A [REDACTED].

14 Q Where did he go to school?

15 A The University of North Carolina and  
16 Bloomington, NCW.

17 Q How long did that discussion take,  
18 the one you just talked about?

19 A Five, five or so minutes, couple  
20 minutes, and then it is --

21 Q Five minutes. Do you know how long  
22 five minutes is?

23 A I want to say about 5 -- it was not  
24 a quick you-and-me conversation. It was -- it

1 takes it could have -- it wasn't ten minutes. I'd  
2 say five or shorter -- about five minutes.

3 MR. ZIKO: What time do you have on your  
4 computer?

5 THE COURT REPORTER: 10:15.

6 BY MR. ZIKO:

7 Q What happened after that?

8 A Practice.

9 Q And did anything else occur during  
10 practice that referenced this event?

11 A No, because I went off with the goal  
12 keeper stuff.

13 Q Now, during your earlier testimony,  
14 you referenced that there were a couple instances  
15 things were stated about you. Was this one --  
16 this, "What about Trim'n incident," was this one  
17 of those instances?

18 A Yes.

19 Q What other instances where you were  
20 discussed, occurred --

21 A Discussed with the girls or in  
22 reference with Anson?

23 Q With Anson present at these warm up  
24 events?

1           A           Were they before that? I  
2           misunderstood your question.

3           Q           You said there were a couple  
4           instances where you're -- you were discussed?

5           A           Um-hum.

6           Q           Okay. And this, "What about Trim'n"  
7           instance was one them?

8           A           Um-hum.

9           Q           Can you tell me about any other  
10          instances that you would place in the same  
11          category?

12          A           Yes.

13          Q           Tell me about the next one you  
14          remember.

15          A           It was just discussion of the girls  
16          asking me about my, you know, who I was --  
17          conversation of me, and my -- who I was dating,  
18          where I was out, who was that guy, you know,  
19          because I'd have guy friends come and watch the  
20          game.

21          Q           Was that event before or after the  
22          Trim'n event?

23          A           I can't remember.

24          Q           Tell me what you remember about that



1 event. Start with who was present.

2 A The team.

3 Q The team was present. Was it during  
4 the warm up time?

5 A I want to say it was during the warm  
6 up, after we had -- the next day after a game.

7 Q So it was during a warm up time?

8 A Practice time, warm up time.

9 Q Was Anson present?

10 A Um-hum.

11 Q Who else was -- was Bill Paladino  
12 present?

13 A All the coaching staff was present  
14 and the trainers.

15 Q And what was the first thing you  
16 remember anybody saying that addressed you, you or  
17 your life in particular?

18 A Asking who the guy was -- talked to  
19 a friend after the game asking who that guy was,  
20 wanting to know if that was a love interest or a  
21 friend.

22 Q Was that the word they used, "Love  
23 interest"?

24 A They wanted to know -- no, "love

1 interest" was not the word they used.

2 Q What word did they use?

3 A Well, they wanted to know if that --  
4 is that a friend, is that someone, is that more  
5 than a friend, is he -- you know how girls talk.

6 Q Who was it that said that?

7 A I can't remember.

8 Q What do you remember being said  
9 next?

10 A They were just teasing me about it  
11 because I had said, "No, he is just a friend," and  
12 they were giving me a teasing." Oh, well, he  
13 looked like more than a friend, and do you hug all  
14 your friends," and I always hug, so...

15 Q What do you mean "you always hug"?

16 A Well, if it is a friend and they say  
17 "Hey" and come to you open arms, then I hug back.

18 MR. ZIKO: What time do you have on your  
19 computer now?

20 THE COURT REPORTER: 10:19.

21 BY MR. ZIKO:

22 Q At some point in time did Anson say  
23 anything to you on this occasion?

24 A I can't remember. He was present.

1           Q       Did that first discussion take 5  
2 minutes or did it take less time?

3           A       Less time. About five minutes -- I  
4 mean, up to -- no later than -- no more than five  
5 minutes.

6           Q       Tell me about any other instances  
7 that you remember where your personal life was  
8 discussed that you would place in the same  
9 category as the Trim'n event.

10          A       I have a question. In the same  
11 manner or -- can you restate that for me?

12          Q       I believe we started this line of  
13 questioning when I asked you whether there were  
14 any occasions where your personal life was  
15 discussed that Anson participated in.

16          A       Um-hum.

17          Q       Okay. And you talked about the  
18 Trim'n incident?

19          A       Um-hum.

20          Q       And that -- whatever the origins of  
21 that was, you discussed the Trim'n incident; do  
22 you remember the Trim'n incident?

23          A       Um-hum.

24          Q       We've now talked about this incident

1 where the other girls on the team talked about  
2 your love interest, right?

3 A Um-hum.

4 Q You don't remember whether Anson was  
5 there or whether he said anything; is that  
6 correct?

7 A He was there, but I can't remember.

8 Q Now, are there any other instances  
9 like that Trim'n incident?

10 A That affected me directly?

11 Q Yes.

12 A Not that I can remember.

13 Q So during the two years that you  
14 were on the UNC women's soccer team, you can now  
15 remember that there were these two instances,  
16 where your personal life was discussed by the team  
17 where Anson was present, correct?

18 A At practice.

19 Q At practices.

20 A Yes. There are instances of being  
21 out to dinner or at his house. When you bring the  
22 boyfriend to his house, it is -- I was assuming  
23 you were referring to the practice incidents; is  
24 that correct?

1 Q Yes. Now, what did Anson do to  
2 humiliate [REDACTED]?

3 A Make her out to be the team slut.

4 Q Was slut a word that you ever heard  
5 Anson use with respect to [REDACTED]?

6 A Directed towards her or in  
7 conversations joking -- his quote how he says  
8 joking with Prentice or Dino.

9 Q By Dino, you mean William Paladino?

10 A Yes, we all call him Dino. This is  
11 why you are supposed to call Anson, Anson.

12 Q Have you ever, yourself, heard Anson  
13 use the word slut with respect to [REDACTED]?

14 A Yes.

15 Q Tell me about that.

16 A Just him and Prentice, Dino is  
17 there, and they are joking back and forth about  
18 that they had been sending dirty e-mails, dirty  
19 jokes between them. [REDACTED], [REDACTED] --  
20 [REDACTED], and then his humiliation of  
21 [REDACTED] would be asking her who the fuck of the  
22 week, fuck of the hour, asking if she got, you  
23 know, got the guys' names as they came to the door  
24 or whether she just took a number. "Is there a

1       guy you haven't fucked yet, and it would repeat.

2               Q       And these events that you've just  
3       described, were they all during warm-up time?

4               A       During warm-up or during practice,  
5       , yes.

6               Q       How many of them occurred during  
7       practice versus warm up time?

8               A       Well, warm up time is part of the  
9       practice.

10              Q       So you are not distinguishing  
11       between those; is that correct?

12              A       No. Can I explain that?

13              Q       Go ahead. You can explain anything.

14              A       Because you show up with your stuff,  
15       certain amount of time ahead of time, you get your  
16       stuff on, and then we -- just with any practice,  
17       there is a series of -- you go through, you do  
18       some running, you do some stretching, you start  
19       knocking the ball around, and then you go into the  
20       drills. So it is encompassed -- it is still  
21       practice time, warm-up is still the getting --  
22       prepping and everything else is still part of that  
23       time frame.

24              Q       It is true, is it not, that after

1 Q Did you ever hear [REDACTED] complain  
2 about the way Anson talked to her?

3 A No, as I stated before, she liked  
4 the attention and comments.

5 Q In fact, you testified earlier that  
6 there were several girls who liked the attention  
7 and were flattered; isn't that correct?

8 A Several -- are you saying several as  
9 in --

10 Q Several as in more than two?

11 A Yes, more than two.

12 Q How many would you say were  
13 flattered by the attention?

14 A Six, seven, somewhere in there.

15 Q Eight?

16 A Eight, somewhere in that range.

17 Q Six, seven, eight, nine?

18 A Six, seven, eight, right in that --

19 Q What are their names?

20 A Well, [REDACTED] was flattered -- I would  
21 say in that range. To go through a roster, I have  
22 to look at the name and say "yes/no, yes/no." I  
23 haven't talked to these girls in five years.

24 Q [REDACTED] --

1 roster. I don't have it off the top of my head.

2 Q So what happened on that occasion?

3 A They were commenting on, they were  
4 doing sorority stuff. It was just saying he had  
5 picked on [REDACTED] about doing the sorority, just, you  
6 know, "Why do you need to join a sorority." They  
7 were doing the sorority stuff.

8 Q And by doing sorority stuff, do you  
9 mean like rushing sororities?

10 A Um-hum.

11 Q And Anson teased [REDACTED]  
12 about that; is that your testimony?

13 A [REDACTED] was there when he was  
14 teasing the group of girls. [REDACTED] little sister  
15 -- [REDACTED] was there, about doing the sorority,  
16 because [REDACTED] was excited about doing the sorority  
17 -- and they had talked about joining the sorority.

18 Q [REDACTED]?

19 A Yes, had joined a sorority.

20 Q What else do you recall Anson doing  
21 to humiliate [REDACTED]?

22 A That is it.

23 Q [REDACTED], what do you  
24 recall Anson doing to humiliate [REDACTED]



1 [REDACTED]?

2 A Just calls her [REDACTED]

3 Q And did you hear him call her [REDACTED]?

4 A Um-hum.

5 MR. VARCHETTO: You have to say yes or no.

6 THE WITNESS: Yes, sorry.

7 BY MR. ZIKO:

8 Q And do you know the origins of that  
9 nickname?

10 A In reference to she never went out  
11 with -- she -- the girls tried to set her up with  
12 -- on a date with a guy. She was not into it; she  
13 didn't have interest in the guys, men, boys, I  
14 guess.

15 Q And do you know whether Anson was  
16 the one who originated the name [REDACTED]?

17 A I do not know.

18 Q When did you first hear the name  
19 [REDACTED] in relationship to [REDACTED]?

20 A At practice, warm-up time.

21 Q And who was it that said it?

22 A I can't remember. That was just the  
23 first incident.

24 Q Now, you earlier testified that you

1           A           Because if you called her [REDACTED], she  
2 would make this look on her face. (Indicating.)

3           Q           What else do you know that Anson did  
4 to humiliate [REDACTED]?

5           A           He chimed in when they were  
6 discussing -- the girls had set her up on a date,  
7 you know, the guy wanted to see her again, and  
8 [REDACTED] had no interest in it.

9           Q           And what did Anson say on that  
10 occasion?

11          A           He was chiming in, just teasing her,  
12 "Why don't you" -- you know, "Does she not like  
13 the guy, does she not like the guys? Why don't  
14 you" -- you know, "He seemed to like you." Join  
15 in with the girls' discussion.

16          Q           This was also during warm-up --

17          A           Like a practice warm-up time.

18          Q           What else did Anson do to humiliate  
19 this [REDACTED]?

20          A           That is about it.

21          Q           [REDACTED].

22          A           Um-hum.

23          Q           What did Anson do to humiliate [REDACTED]  
24 [REDACTED]?

1           A           Yes.

2           Q           Is it your testimony that Anson  
3 Dorrance humiliated Debbie Keller?

4           A           Made her feel uncomfortable, yes.

5           Q           So is it your testimony that Anson  
6 Dorrance humiliated Debbie Keller?

7           A           I'm not Debbie so I can't say if  
8 that -- it is possible, yes. In front of us, no.  
9 She just expressed she was uncomfortable and  
10 didn't like the touching, the affection -- the  
11 over-affection she was receiving.

12          Q           Did you ever -- strike that. Do you  
13 believe William Paladino ever humiliated any of  
14 the women on the soccer team?

15          A           No. Dino was there. Dino didn't do  
16 anything to stop it.

17          Q           Did you ever have any meetings with  
18 Anson Dorrance when you and Anson were the only  
19 two people present?

20          A           Yes.

21          Q           When was the first time you met with  
22 Anson without anyone else being present?

23          A           Our player/coach meeting, final  
24 four, freshman year. That was the hotel room, and

1 he said you still had to be there. Was that a  
2 specific conversation that happened somewhere?

3 A Yes.

4 Q Where were you?

5 A I want to say so -- in some sort of  
6 -- in an office or a meeting place with -- an  
7 office, the trailer, the shack, somewhere.

8 Q And what was the occasion of that  
9 meeting?

10 A I can't remember.

11 Q Was it one of the player/coach  
12 conferences that you had earlier referenced?

13 A No, because there is like an  
14 end-of-the-season -- you know, get-together. He  
15 would call people in, so I don't know if he would  
16 just call them in if he was unhappy with something  
17 or there was a concern or you wanted to talk. You  
18 know, you could talk to him whenever. It wasn't  
19 -- but we had a specific end-of-the-season meeting  
20 and that was not that time.

21 Q What else do you remember being  
22 discussed between you and Anson at that meeting?

23 A That meeting was just his concern of  
24 me not spending as much time with the girls, not

1 spending time, not doing stuff with them off  
2 practice.

3 Q And can you place that in a time  
4 frame? It was after you started practice --

5 A Playing.

6 Q Playing. So it was after the season  
7 had started, your freshman year, right?

8 A Yes.

9 Q Was it September, October, November;  
10 do you know?

11 A I can't. Just fall.

12 Q All right. When was the next time  
13 you remember Anson saying anything inappropriate  
14 to you or towards you, I guess is what -- when was  
15 the next time you heard Anson say anything  
16 inappropriate directly towards you?

17 A Still that fall of, "melissa, you're  
18 rich enough, go get \$400.00 out of the bank to go  
19 get the team Gatorade."

20 Q And did you go get the money?

21 A Yes. I was told to go get the  
22 money.

23 Q And how much Gatorade did you buy?

24 A Enough for our team and the other

1 drinking, when was the next time that Anson said  
2 anything to you that you considered to be  
3 inappropriate?

4 A That whole hotel incident.

5 Q When did that happen?

6 A Fall freshman. Freshman -- between  
7 fall season and the end of freshman year.

8 Q And where were you?

9 A In a hotel room, having our --  
10 everyone had to go in and have our meetings.

11 Q Where was the hotel?

12 A The tournament was at Santa Clara,  
13 so I don't know the name of --

14 Q Someplace in California?

15 A Yes.

16 Q But not the Hotel California?

17 A No.

18 Q Everybody had one-on-one meetings  
19 with Anson in his hotel room on that occasion,  
20 right?

21 A Yes.

22 Q Were you the first one to have such  
23 a meeting?

24 A No.

1           A           The area we were in, no. We were by  
2 a table by the window, it is two chairs, it is  
3 dark, there is the bed.

4           Q           Why was it dark; was it nighttime?

5           A           I don't know -- it wasn't, you know,  
6 small, dim light. It is not a very well-lit room.  
7 Like this is well-lit. That was not.

8           Q           What else do you remember about the  
9 room?

10          A           Not made. Stuff was all over the  
11 place.

12          Q           What happened at the door to the  
13 room?

14          A           Just invited to come, you know, it  
15 was kind of the "next." Anson is there, tells you  
16 to have a seat.

17          Q           Was there a published list of  
18 players with times to appear?

19          A           I can't remember.

20          Q           So you were at the door, and  
21 basically Anson -- was it Anson who said next?

22          A           Anson comes in, and I want to say he  
23 was at the door -- I can't remember. And he said  
24 "Take a seat."

1 Q You went into the room?

2 A Yes.

3 Q What happened next?

4 A You are asked to take a seat, so I  
5 sit down in the chair.

6 Q What happened next?

7 A Anson proceeded -- kind of does the  
8 little small talk, you know, how are you doing,  
9 what is going on -- it is -- I don't know, a  
10 conversation, I would say, to try to get you --  
11 obviously, I was -- I knew I was uncomfortable.

12 Q Why were you uncomfortable?

13 A I was -- because I just didn't feel  
14 comfortable with Anson, from stuff that had gone  
15 on -- the conversations that had gone on at  
16 practice. Him making the comment of me not -- you  
17 know, telling me I'm not participating at these  
18 parties, and I knew I had only gone to one or two,  
19 trying to make a compromise of participating in  
20 those functions with the team. He just was not  
21 giving me that warm, friendly feeling.

22 Q You were expecting, when you went  
23 into that room, for Anson Dorrance to be critical  
24 about your performance as a soccer player, weren't



1     you?

2             A       Critical or just expressing --

3             Q       You were expecting, when you went  
4     into that room, to meet with Anson Dorrance, for  
5     him to be critical about your performance as a  
6     soccer player, on the UNC women's soccer team,  
7     were you not?

8             A       Critical is the word that is  
9     throwing me. I was expecting him to tell me about  
10    the season; where I needed to improve.

11            Q       You did not expect him to praise  
12    your performance as a player of the UNC women's  
13    soccer team, did you?

14            A       I didn't know -- whether he was  
15    going to be critical or negative.

16            Q       So prior to that time, you had no  
17    idea what your performance had been like on the  
18    UNC women's soccer team?

19            A       Well, I had an idea.

20            Q       Well, what was that idea?

21            A       That I was doing fine, and --

22            Q       So this is at the end of your  
23    freshman year?

24            A       Um-hum.

1           Q           Playing soccer. You had the idea  
2 that you were doing fine as a soccer player on the  
3 women's soccer team at UNC Chapel?

4           A           Yes. I was happy where I was at. I  
5 knew I was not the number one keeper, but I was  
6 happy with my performance. I wasn't expecting to  
7 get bombarded, if that is what you are trying to  
8 -- I wasn't expecting my personal life to come  
9 into the conversation. I was not expecting, once  
10 I presented opposition to him, then he said, "Well  
11 your stats are here, you are not doing well, you  
12 need to do this, you need to do that, your grades  
13 are slipping." There is something wrong, you know.

14          Q           Let's go more slowly.

15          A           Okay. Sorry.

16          Q           You came in and you sat down?

17          A           Um-hum.

18          Q           Did Anson sit down?

19          A           Um-hum.

20          Q           Where did he sit in relationship to  
21 you?

22          A           Can I give you a visual --

23          Q           You can describe it. She needs to  
24 take it down.

1           A           There is those small, little tables  
2           that are in a hotel room. There is a chair there,  
3           you know, the windows -- the windows to the side  
4           of the table, and he is sitting down. We're  
5           nearly knee to knee, in a facing manner.

6           Q           But a table between the two of you?

7           A           Not between us. I could rest my  
8           arm. The table would be just barely jutting.

9           Q           So, okay.

10          A           I could rest my arm on it, but not  
11          -- it was not as if how you and I are across the  
12          table.

13          Q           Do you remember him asking you how  
14          you felt?

15          A           He asked if I had been okay. If I  
16          was -- yes. If I felt okay. If I -- it came in  
17          the discussion of "you are" -- you know, "you  
18          seem" -- "are you comfortable?" It was this --  
19          "you seem uncomfortable." Well, yes, I am  
20          uncomfortable.

21          Q           And you were uncomfortable, right?  
22          Isn't that true?

23          A           Yes.

24          Q           And why were you uncomfortable?

1           A           Because of the way he had attacked,  
2           you know, would make comments at practice, the way  
3           other girls were coming out in tears and obviously  
4           upset. I was uncomfortable of where is it going  
5           to go.

6           Q           And where did you think it might go?

7           A           I didn't know where it was going. I  
8           had no -- I was thinking it was going to be a  
9           positive experience.

10          Q           You were thinking it was going to be  
11          a positive experience, and yet you were  
12          uncomfortable. How do you reconcile those two  
13          feelings?

14          A           Uncomfortable because I'm  
15          uncomfortable in a room with him by himself.  
16          Uncomfortable by the comments he had made over the  
17          season.

18          Q           And what comments were those?

19          A           Those comments that it happened --  
20          that I said before, it had happened at practice,  
21          and then with the drinking stuff, I was not -- and  
22          I was hoping it would be a positive experience of  
23          him saying, you know, "This is what has happened  
24          during the season, this is where you are, this is

1 where I would like you to be."

2 Q And when he asked you, if you were  
3 comfortable, what was your response?

4 A There wasn't much of a response.

5 Q What was the next thing that you  
6 remember happening?

7 A We had conversation of, first it  
8 started with my grades, that they needed to  
9 improve.

10 Q What were your grades at that time?

11 A Above water. Keeping my head above  
12 water, surviving.

13 Q Below 2.0 on a GPA of 4?

14 A Yes.

15 Q How many courses had you flunked  
16 your freshman year, at that time?

17 A I remember one for sure.

18 Q How many courses had you taken your  
19 freshman year at that time?

20 A I don't remember.

21 Q Do you recall what your GPA was at  
22 that time?

23 A Below 2.

24 Q How far below 2?

1           A           I don't remember.

2           Q           Were you in danger of losing your  
3 academic status to play soccer?

4           A           I believe so, yes.

5           Q           Was that one of the reasons that you  
6 were uncomfortable when you went into the hotel  
7 room?

8           A           No.

9           Q           So you weren't concerned that you  
10 were about to lose your academic status; is that  
11 your testimony?

12          A           I was concerned, but that was not  
13 why I felt -- I just felt uncomfortable with Anson  
14 in a room by myself.

15          Q           What do you recall Anson saying  
16 about your grades?

17          A           That they needed to improve.

18          Q           And you agree with that, don't you?

19          A           Yes.

20          Q           And what else did he say about your  
21 grades?

22          A           They were not where they needed to  
23 be. That had to --

24          Q           And why did they need to improve?

1           A           They were below what was -- I was on  
2 the border. I believe I was on the borderline of  
3 requirements. They were below where they needed  
4 to be.

5           Q           Did Anson explain to you how  
6 important your grades were?

7           A           Yes.

8           Q           And what did you say when he  
9 explained to you how important your grades were?

10          A           That I just -- "I have to study, I  
11 have to do well I can't -- you know, I have to  
12 pass my classes, same. You know, I have to do  
13 better in school."

14          Q           What else did he say about your  
15 grades?

16          A           That they were not acceptable.

17          Q           What do you -- what did you  
18 understand him to mean when he said your grades  
19 were not acceptable?

20          A           That I needed to bring them up.

21          Q           Or what would happen?

22          A           I don't know.

23          Q           Excuse me?

24          A           I don't know.

1           Q           Is it your testimony today that you  
2 did not --

3           A           He didn't tell me --

4           Q           -- understand. Is it your testimony  
5 today that you did not understand that if you did  
6 not raise your grades, he would cut you from the  
7 soccer team?

8           A           I was not told that directly.

9           Q           You were not told that. Did you  
10 understand that from the conversation you had with  
11 Anson at the end of your freshman year?

12          A           That if I didn't -- if I didn't  
13 bring them up, he was going to cut me?

14          Q           Yes.

15          A           He never said that directly --

16          Q           Did you understand that?

17          MR. VARCHETTO: You don't have to yell at  
18 her, but you can ask her.

19          THE WITNESS: Did I assume that?

20          MR. ZIKO: Yes.

21          THE WITNESS: Yes.

22          BY MR. ZIKO:

23          Q           What else did he ask you about your  
24 grades?

25          A           That was -- at that meeting that was



1 -- I needed to bring them up, asked if I had been  
2 going to the tutor.

3 Q Had you been going to the tutor?

4 A Yes, we were required to go to the  
5 tutor.

6 Q What else did he ask you about your  
7 grades?

8 A Just if I needed the help, was I  
9 going to the tutor? As a freshman you are  
10 required to go to the tutor session.

11 Q Were your parents at that time aware  
12 of what your grades were at UNC Chapel?

13 A To the best of my knowledge.

14 Q Yes or no?

15 A Yes.

16 Q What was your parents' attitude  
17 towards your below 2.0 grade point average?

18 A That I needed to do better.

19 Q And what did your father tell you  
20 about how much better you needed to do on your  
21 grades?

22 A A lot better.

23 Q And did your father tell you that if  
24 your grades did not get above 2.0, he would take

1 you out of UNC Chapel Hill?

2 A I don't recall.

3 Q Did you understand if your grades  
4 didn't come above 2.0, that your father would  
5 withdraw his support of your education?

6 A What do you mean by "support"?

7 Q Your education was being paid for by  
8 your parents; is that correct?

9 A Yes.

10 Q Or was it being paid for from your  
11 trust fund?

12 A By my trust fund.

13 Q Were there requirements in your  
14 trust fund, that in order to continue your  
15 university education, you needed to maintain a  
16 certain GPA?

17 A I don't know that.

18 Q Did your father tell you that if you  
19 did not maintain a higher GPA, that he would  
20 withdraw his support for your education?

21 A I have a question. You tied that --  
22 I understood the first question of the trust not  
23 understanding, but he doesn't -- I'm not  
24 understanding where you'd asked if the trust had

1 anything in there about my GPA.

2 Q Right.

3 A And it did not, to my knowledge.

4 Q Did your trust have anything in it  
5 about your need to maintain an adequate academic  
6 performance?

7 A Not to my knowledge. I don't know  
8 that information -- I don't know that information.  
9 I don't know if there is anything.

10 Q Did you discuss your GPA with your  
11 mother?

12 A I don't know, but they --

13 Q Why was your GPA so low?

14 A I was not happy. I was  
15 uncomfortable, had been thrown --

16 Q And why weren't you happy?

17 A Just with -- just felt so -- I had  
18 never had a coach that created an environment that  
19 Anson had created, a hostile, uncomfortable --  
20 telling me I'm not participating on the team by  
21 doing the drinking. What I did outside of the  
22 team was irrelevant to any of my other coaches,  
23 the hostile environment. I felt I was just very  
24 uncomfortable.

1 I found it hard to focus by just the  
2 constant -- by the environment that was created --  
3 it was very hard to focus.

4 Q Was part of the environment that was  
5 created in an environment that was negatively  
6 critical of your performance as a soccer player?

7 A Could you restate that -- and I want  
8 to get a bathroom break before you ask another.  
9 Is that possible?

10 Q I don't want to make you  
11 uncomfortable. Do you need --

12 A I just knew I couldn't leave a  
13 question.

14 Q You can leave any time you want.

15 A Okay.

16 Q We can take a bathroom break.

17 A I didn't want to get in trouble.

18 (Recess.)

19 BY MR. ZIKO:

20 Q Was part of the environment, an  
21 environment in which people were critical in a  
22 negative way about your performance as a soccer  
23 player?

24 A My understanding was that meeting

1 was to give us a performance all around as a  
2 player, my performance in school, performance on  
3 the team.

4 The purpose of that meeting was to  
5 give us a feedback from him as a player, as a  
6 student.

7 Q Okay.

8 A Does that answer your question?

9 Q But you had said something about how  
10 the environment on the soccer team affected your  
11 grades; is that your testimony?

12 A Yes. Because it took my focus --

13 Q Was part of that environment that  
14 affected your grades, a soccer environment in  
15 which the people responsible for the soccer team,  
16 the coaches, were critical in a negative way about  
17 your performance as a soccer player?

18 A No.

19 Q Meaning that -- I'm not sure I'm  
20 understanding 100 percent here.

21 Q During the time of your freshman  
22 year, were there any coaches on the soccer team  
23 who were critical of your performance in a  
24 negative way?

1           A       Sure.

2           Q       Okay. Was the fact that you were  
3 not a first string goal keeper affecting your  
4 performance in the school?

5           A       No.

6           Q       Was the fact that you were not the  
7 second string goal keeper affecting your  
8 performance --

9           A       No. Where my position was, was not  
10 -- it was --

11          Q       Was the fact that other girls on the  
12 team were critical of your performance as a soccer  
13 player part of what was affecting your performance  
14 at school?

15          A       No. Like I said before, it was the  
16 drinking comments, the comments made about all the  
17 girls, and their sexual stuff that just made me  
18 uncomfortable, It had nothing to do with my  
19 performance as a player.

20          Q       Now, when you were talking to Anson  
21 about your grades, how long did you talk about  
22 your grades?

23          A       For a time period, being specific is  
24 too hard.

1           Q       And during that time, Anson asked  
2 you why your grades weren't better, didn't he?

3           A       I'm sure he did.

4           Q       And what was your response at that  
5 time?

6           A       I don't remember. It was -- I was  
7 just -- I don't remember. I can't recall.

8           Q       And in the course of asking you  
9 about why your grades weren't better, did Anson  
10 ask you whether you were happy at the University  
11 of North Carolina at Chapel Hill?

12          A       I'm sure he did. I can't remember  
13 the specifics of we had talked about grades, I was  
14 told I needed to improve, unhappy with my grade  
15 performance, pulling that type of stuff. I don't  
16 -- it's been several years. It is hard to --

17          Q       And when I was asking about your  
18 grades, did Anson ask you about your social life  
19 at the university?

20          A       Yes.

21          Q       And what did you tell him?

22          A       It was none of his GD business.  
23 Referring to asking me -- he -- "after the grades,  
24 it is okay to tell me."

1           Q       You mean, it is okay to tell you  
2 what?

3           A       He is the father figure -- he  
4 portrays himself as the father figure for our  
5 team. We are away from home. "You know, I want  
6 you to feel you can tell me even if you can't tell  
7 your dad anything. I want you to tell me what" --  
8 we are away from home. He is our father figure,  
9 that is how it is supposed to make us feel  
10 comfortable, to tell him what is bothering us,  
11 whether it is with our relationship, with our  
12 grades, with our -- is that what you are --

13          Q       And when did Anson make those  
14 comments to you during this meeting?

15          A       Yes.

16          Q       Okay. And when he asked you, "You  
17 can tell me," what did you tell him?

18          A       That it is none of his business what  
19 I do.

20          Q       Okay. Now, did you say it is none  
21 of his business, or did you tell him it was none  
22 of his God damn business?

23          A       "None of his God damn business what  
24 I do off the field," and that was, it was -- you



1 know, that occurred between, when he had made --  
2 asking me who I'm fucking, if I'm sleeping with  
3 anybody, who I needed to be, you know, am I doing  
4 anything, is that affecting your -- is that  
5 affecting your grades, is that affecting your --  
6 it brought in my -- I was uncomfortable with him  
7 discussing anything out of me as a player, me as a  
8 student, bringing my social life into it is --

9 Q How did your social life get drawn  
10 into it?

11 A (No response.)

12 Q Did your social life get drawn into  
13 it when Anson started asking you about why you had  
14 a grade point average below 2.0?

15 A It is very possible.

16 Q And what was it specifically Anson  
17 asked you about why your grade point average was  
18 below 2.0? What do you remember about that part  
19 of the conversation?

20 A Not a lot. It --

21 Q What is the next thing you remember  
22 about that conversation?

23 A Before or after I made the none of  
24 his business, none of his GD business comment?

1           Q           I'm asking you what you remember the  
2 next thing that happened in the conversation.

3           A           Then started talking about my  
4 performance as a player.

5           Q           And what did he say about your  
6 performance as a player?

7           A           Saying my stats weren't -- they  
8 needed to be, I needed to do better -- my stats,  
9 meaning performances during, like lifting or 1V1s  
10 or running and stuff like that. That was my --  
11 you had said about my performance as a player, as  
12 a soccer player on the field, not in the other  
13 aspects of a player. Because when you said --  
14 asked the environment of being critical as a  
15 player, I am thinking it encompasses, as a  
16 student, my social, the whole player, not just as  
17 a specific soccer player, goal keeper there.

18                       Does that make any sense? So after  
19 the conversation about social life, then it went  
20 right into, "you are not doing well, you need to  
21 improve, this is not acceptable."

22                       So then it went from one to the  
23 other.

24           Q           Okay. You said Anson talked to you

1 about your stats; is that right?

2 A Yes.

3 Q And you said he said they weren't  
4 what they needed to be; is that right?

5 A Um-hum.

6 Q Are those his words or did he use  
7 stronger language than not what they needed to be?

8 A I just remember him telling me I  
9 needed to improve.

10 Q At any point during this meeting did  
11 you start to cry?

12 A Yes.

13 Q Tell me when you started to cry.

14 A I don't know. I remember during  
15 that meeting I did.

16 Q When you started to cry, what was  
17 Anson's reaction?

18 A He kind of gets that little smirk on  
19 his face.

20 Q And then what happened?

21 A Some other -- there was other --  
22 there was another conversation -- something was  
23 brought up that I was just -- I was upset by. And  
24 it was pretty much once I started getting upset

1 the meeting was drawn to a close.

2 I got upset and I can't remember  
3 from the details. He just got that smirk, you  
4 know, "You need to improve," and it goes from  
5 there. And from there it is kind of whirlwind,  
6 because I just wanted to leave at that point. I  
7 felt very uncomfortable.

8 Q Were your grades the first thing you  
9 talked about when you got in the room, after you  
10 had made the small talk?

11 A I want to say so.

12 Q What is the next thing you talked  
13 about after your grades?

14 A Social.

15 Q And tell me about that conversation.

16 A We already if -- that was with the  
17 whole social life.

18 Q Tell me what you remember about that  
19 part of the conversation.

20 A Once again, him stating he is my,  
21 you know, my father away from home, he is our  
22 father figure. I should feel okay to tell him  
23 anything. He asked me if I'm fucking anybody.  
24 What is going on in my social life? Is that

1 affecting my grades, is that affecting me as a  
2 player? He needed that information to best help  
3 me, and then it goes into, "Well, your performance  
4 is -- this is where your stats are at. Your  
5 performance is not here." I'm upset, end of the  
6 conversation.

7 Q Okay. And did he use the phrase  
8 "Who are you fucking"?

9 A Yes.

10 Q And at what point in the  
11 conversation did he use that phrase?

12 A I already stated that. Are you  
13 asking me? I'm sorry. Do you want me to --  
14 during the social -- when he was talking about  
15 after the grades discussion, in between my social  
16 life and --

17 Q What was the first thing you  
18 remember him saying about your social life or  
19 asking about your social life?

20 A "Who are you fucking, are you  
21 sleeping with anybody, is this encompassing -- is  
22 this -- is there a problem, what is causing a  
23 problem with your grades, with your performance?"  
24 This just threw me. It threw me in a way -- at

1 first I was just kind of taken back, because he  
2 used fuck a lot, but then in reference to me, it  
3 made me very uncomfortable, and I just kind of --  
4 I clammed up, shut down, because I didn't think it  
5 was any of his right to ask me those -- that  
6 question.

7 Q And how did you express yourself  
8 when you told him you didn't think it was his  
9 right to ask that question?

10 A "None of his God damn business."  
11 And then he obviously got upset at that comment.  
12 He wasn't happy with that comment.

13 Q And were you at that time dating  
14 anybody?

15 A I want to say so, yes.

16 Q Prior to that, had you been dating  
17 somebody else?

18 A Yes.

19 Q And during your freshman year, how  
20 many different guys had you dated?

21 A Four? I mean, they were not serious  
22 relationships, so when you mean dating, do you  
23 mean going out and eating; do you mean before I  
24 started dating Dave? Dave was the end of my

1       freshman through my sophomore.

2               Q       Dave Myers we mentioned earlier?

3               A       Yes, end of my freshman.

4               Q       Were you dating him at this time?

5               A       Could have been right in there. It  
6       was the end of that time, beginning of -- it is  
7       possible.

8               Q       But prior to that you had dated  
9       several guys?

10              A       Yes. I have gone out, went to  
11       dinner, went to movies. Nothing of a nature that  
12       would expect a question of whether I'm having sex  
13       with these men or not, and the fact it is assumed  
14       I am because I'm going out with -- was very  
15       uncomfortable.

16              Q       You know, why are you saying that  
17       Anson assumed you were having sex --

18              A       Him asking me if I'm fucking anybody  
19       would be the assumption of -- you wouldn't ask  
20       your daughter if she is fucking anybody.

21                      My father would never ask me that  
22       type of question. I don't think anybody would ask  
23       that question, unless you are assuming they  
24       already had sexual relationships with people. I

1 don't think you would ask anybody, let alone  
2 whether they are sleeping with anyone, without  
3 assuming that they already are.

4 Q And then when you told him it was  
5 none of his God damn business, what happened after  
6 that?

7 A I was upset, and then we went in  
8 talking about my performance as a player, my  
9 stats, and then it is done.

10 Q And what did Anson tell you at the  
11 end of the meeting, about what you had to do in  
12 order to continue as a member of the soccer team?

13 A Improve my grades, first and  
14 foremost, and then, obviously, improve my  
15 performance, make my -- you know, fight for that  
16 first string, second string position.

17 Q What about your conditioning,  
18 separate and apart from your skills as a goal  
19 keeper, what about your conditioning? Did Anson  
20 talk to you about your level of conditioning?

21 A He said that -- that I would say is  
22 included in my performance as a player. It needs  
23 to improve, telling me it is not where he expects  
24 it to be. It is not where his standards are.



1           Q           At this point in your freshman year,  
2           had you ever played in any game that the UNC  
3           women's soccer team had played?

4           A           I played in it one, maybe two. One  
5           was like a preseason game and one was -- I want to  
6           say one game.

7           Q           One game?

8           A           Um-hum.

9           Q           What was the score at the end of the  
10          game?

11          A           I don't know. We were winning by a  
12          lot.

13          Q           To whom did you speak about that  
14          meeting, after that meeting?

15          A           A couple of the girls -- right  
16          directly after?

17          Q           Directly after the meeting, to whom  
18          did you speak?

19          A           I don't --

20          Q           Did you speak to any women on the  
21          team sometime later about that meeting?

22          A           At a later time I had spoken to, I  
23          know my parents, I want to say.

24          Q           How much later did you speak to your

1 THE WITNESS: She was a person in the  
2 Chancellor's office that I felt I could talk to.

3 BY MR. ZIKO:

4 Q Why did you think you could talk to  
5 her?

6 A She was a woman. She had presented  
7 herself as being okay and open doors to talk to,  
8 and I had brought concern before into her office.  
9 I felt comfortable with her, because she had  
10 always been relatively, when I first -- I'm not  
11 sure when I first made contact, but that it was  
12 okay to discuss -- that it was during the fall of  
13 my freshman year is when I first made contact, but  
14 the specific date, I'm not sure. Because I  
15 believe I went with her -- my first concern was  
16 why Anson didn't, one, tell my team that I had  
17 been sick, and the teammate had gotten mad and  
18 upset, that they didn't know I was in the  
19 hospital, and I was sick, and he didn't bother to  
20 tell any of the girls, and I thought that was  
21 inappropriate, and the fact with the alcohol of, I  
22 didn't know how to approach Anson on that.

23 Q So when did you first meet with  
24 Susan Ehringhaus?

1           A           Following my freshman year.

2           Q           Was that the first time you had  
3 spoken to her?

4           A           Yes.

5           Q           Prior to that where had you seen  
6 her?

7           A           I'm not sure when.

8           Q           Why did it come into your mind to go  
9 and meet with Susan Ehringhaus about any concerns  
10 you had?

11          A           She was in the Chancellor's office,  
12 I want to say, some sort -- that she was a lawyer,  
13 who knew the legality of -- I didn't want to get  
14 in trouble for being at these parties where there  
15 was drinking, and if I was going to comply to  
16 Anson's request of being more involved, I didn't  
17 -- I wanted to make sure I wasn't going to get in  
18 trouble.

19          Q           So tell me about your first meeting  
20 with Susan Ehringhaus. What was said and who said  
21 it, to the best you can recall today?

22          A           We discussed -- because I had a  
23 couple meetings, so I'm trying to distinguish  
24 stuff that was going on at practice, his request

1 for me to be involved more at these parties with  
2 the drinking, and she encouraged me, she said,  
3 "Well, are you sure you are taking what is being  
4 said in the right context? You need to go and  
5 talk to Anson about this" -- she basically tried  
6 to get me to go meet with Anson and see if I can  
7 resolve it.

8 Q And that is the drinking issue,  
9 right?

10 A Yes. And being more involved with  
11 the parties and the drinking and --

12 Q Now --

13 A And then with also the fact of not  
14 showing up to, you know, not having much of a  
15 concern for the fact that I was sick and not -- it  
16 was all tied together, for the drinking and being  
17 sick and him not telling the teammates, and I have  
18 my teammates going, "Why the hell weren't you at  
19 the game? "Well, he failed to tell them I spent a  
20 little under 12 hours in the ER and then was in  
21 the hospital, and then leading up again to his  
22 thing with the money, singling me out with, "Well,  
23 you are rich enough, go get the money." It was  
24 that order. And she had encouraged me to try to

1 resolve it with making sure I was sharing my  
2 contacts of stuff that was being done, because I  
3 had described the environment -- when you say with  
4 the practice of the things that were being said  
5 that made me feel uncomfortable, and hostile  
6 sexual nature, and she basically encouraged me to  
7 try to work it out with Anson, that she knew him  
8 as a good man, and wasn't -- you know, wanted to  
9 make sure that I was 100 percent, and that I  
10 should take it up with Anson.

11 Q When was that meeting?

12 A Fall. Between September through  
13 November, fall, not August.

14 Q Of what year?

15 A '96.

16 Q Is it your testimony that in the  
17 fall of 1996, you met with Susan Ehringhaus --

18 A Yes.

19 Q And you told her that there was a  
20 hostile sexual atmosphere at soccer practices and  
21 on the soccer team?

22 A Yes.

23 Q And what words did you use? Did you  
24 use the words hostile sexual atmosphere?

1           A           I told her about the sexual comments  
2 that were made. It was an environment that was  
3 not -- there was a humiliating, uncomfortable  
4 environment with sexual comments being made,  
5 referring to girls and all that stuff. And she  
6 was just -- she said, "Well, to make sure that I  
7 go and talk to Anson, and that it is okay, you  
8 know, that I should try to work it out with him,  
9 that am I really taking those comments into  
10 context, am I" -- questioning me whether I was 100  
11 percent sure whether that environment was the way  
12 it was, or those comments made were the way they  
13 were. And she basically just gave me the sugar  
14 coating, "Anson is a great guy. I've known him  
15 for a long time," shoved me out the door. Was not  
16 -- didn't seem that concerned.

17                       So I tried to do her request of, you  
18 know, okay. These are the things Anson wants  
19 done. Apparently I can't -- because she said she  
20 was somewhat concerned with the drinking issue of,  
21 "Well, he shouldn't be encouraging, you need to do  
22 these things," and I said, "Well, where do I  
23 compromise on being involved in the drinking,  
24 being at these parties where I know binge drinking

1 is going on, how do I," you know, "I'm stuck  
2 between I know it is wrong, how do I do it?"

3 How do I make that work, and then  
4 brought in, obviously, stuff that was going on at  
5 practices, and how that made me feel,  
6 uncomfortable, filthy, humiliated. And she did  
7 the, once again, the sugar coating of, "Anson is  
8 good." She wanted to know all of the aspects that  
9 were going on.

10 Q So she wanted to know all of the  
11 aspects?

12 A Um-hum.

13 Q And you told her everything?

14 A I told her about the drinking, the  
15 comments being made at practice.

16 Q What comments being made at  
17 practice?

18 A The sexual comments about who is  
19 shacking up, who the fuck of the week is -- I gave  
20 her a run-down of what I thought would encompass  
21 everything, and talked about the fact that I was  
22 kind of disturbed of, you know, if I'm sick, he  
23 doesn't seem to be concerned, and he makes it out  
24 to be my fault that I'm sick. And that brings up

1 a point of -- in a meeting he was saying -- it was  
2 some sort of discussion where if you're sick, it  
3 is your own weakness, it is your own mental  
4 weakness if you are sick, with the cold or the flu  
5 or anything else.

6 Q How long was your meeting with Miss  
7 Ehringhaus?

8 A I don't know enough -- specific  
9 time. That was several years ago, so...

10 Can we go to lunch now?

11 Q I don't want to make you  
12 uncomfortable, but I do want to finish this.

13 A Okay. That is fine. After that,  
14 can I go get lunch?

15 Q Now, that meeting was sometime in  
16 the fall of 1996?

17 A Um-hum.

18 Q Now, you say you had another meeting  
19 with Miss Ehringhaus?

20 A Yes.

21 Q And when was that?

22 A After that meeting. That is the  
23 best description I can give.

24 Q Was it the same year, or was it the



1 next year?

2 A I would say same year. Yes.

3 Q Same year?

4 A Yes, same year. Sorry.

5 Q And what happened at that meeting?

6 A Discussion of the money. It wasn't  
7 -- discussion of the money issue, again, because I  
8 hadn't gotten the money, and how do I get it?  
9 I've been told by the girls if I don't keep  
10 demanding it, I will never see it again.

11 Dino told me I have to stay on top  
12 of Anson or he will just forget about it.

13 Q So the first meeting was after you  
14 had spent the money?

15 A Yes.

16 Q And the second meeting was after you  
17 spent the money before you were reimbursed --

18 A Yes.

19 Q So it was within that time frame?

20 A It is within the fall. It is before  
21 the time I met with her a couple times my freshman  
22 year, and then there was a meeting she was  
23 involved with later, my sophomore year.

24 Q Now, during the second meeting, did

1 you discuss or mention to her anything about  
2 sexual comments at practice?

3 A No. Because my main goal was to  
4 just get reimbursement back, and I wasn't getting  
5 it, and I wasn't getting it from Anson, and I  
6 wasn't getting it from Dino, so I needed to go  
7 elsewhere, because that was -- you know, I had a  
8 budget to work from, for myself, and so that put  
9 me --

10 Q And these meetings with Susan  
11 Ehringhaus were before the meeting in the hotel  
12 room that you described earlier with Anson, right?

13 A Yes, I believe so -- yes.

14 Q And during --

15 A Those two meetings, yes.

16 Q And I realize there was a third one  
17 sometime in the spring of 1998, right?

18 A Yes, sorry.

19 Q And during the first meeting with  
20 Miss Ehringhaus, did she specifically ask you  
21 whether any of the sexual comments you were  
22 talking about were directed to you?

23 A I can't recall.

24 Q All right. And you didn't tell her

1 any of them were directed to you, did you?

2 A No.

3 Q Because they hadn't been, had they?

4 A I was just explaining -- she had  
5 wanted to know what was going on, and what the  
6 atmosphere was, and I was trying to be  
7 descriptive. She wanted to know why I was not  
8 feeling comfortable, so I was trying to describe  
9 the atmosphere, describing practices, the way he  
10 singles me out with the whole money thing and with  
11 being sick and not telling the team. She was more  
12 interested in a general picture.

13 Does that make sense? She was not  
14 sitting here directing questions, how you and I  
15 are directing questions -- you know, where you are  
16 directing questions at me and I'm answering. It  
17 was not a -- in the same setting as a deposition  
18 would be in.

19 It was more of a, "Talk to me in  
20 confidence; this won't get beyond this room,"  
21 which it did, or somehow, because then the  
22 interaction with Anson got worse.

23 Once I went and talked with her,  
24 interactions with Anson became a little more

1 uncomfortable, heated, more confrontational.

2 Q Why did you go to talk with Miss  
3 Ehringhaus?

4 A To try to find -- I had heard that  
5 she had -- was involved with the law somehow that  
6 way, where I could get -- because I didn't want to  
7 get in trouble for the drinking parties.

8 I was trying to compromise, and she  
9 was -- I was trying to find a way to compromise  
10 and meet Anson's demands and be more involved with  
11 the team at parties where binge drinking, where  
12 you know, kegs and girls are drinking, and, you  
13 know, they were sneaking in underage girls -- you  
14 know, I was trying to find a way to say, okay, how  
15 can I be there and not still be, had the  
16 possibility of getting in trouble, legally -- you  
17 know, I didn't want to go to these parties and get  
18 arrested.

19 I was trying to compromise and meet  
20 what Anson wanted, and she was, you know, one that  
21 had been -- I got information that she knew law or  
22 was somehow related to the lawyer, and I knew she  
23 was in the Chancellor's building.

24 Q Who mentioned that this conversation

1 was in confidence, if anybody?

2 A She did.

3 Q And what did she say to you?

4 A She said, "This is in," you know,  
5 "this is between you and me; feel free to tell me  
6 stuff." And even then, I was still hesitant,  
7 because she still was part of the university,  
8 because after we had conversations, things at  
9 practice did not become -- became -- it was just  
10 -- Anson's friendliness had changed towards me.

11 Q So you are saying that prior to your  
12 conversation with Susan Ehringhaus, you had had a  
13 friendly relationship with Anson?

14 A Not friendly -- it was just -- I  
15 felt more comfortable with our relationship. It  
16 was -- you know, there was not a -- you know, he  
17 would smile, be nice, friendly nature.

18 Q And did you determine that  
19 Miss Ehringhaus had spoken to Anson Dorrance or  
20 that what you had told Miss Ehringhaus had found  
21 its way to Anson Dorrance?

22 A Yes.

23 Q How did you determine that?

24 A He just -- his demeanor towards me

1 Q I will --

2 A Well, I'm trying to give it to you  
3 in order. And then he had written a letter. I  
4 got teased because dad had written a letter  
5 getting the money back.

6 Q By whom?

7 A By Anson. It was just -- you know.  
8 Just got teased about, "Daddy wrote you a letter  
9 to get your money back," and I was like, "You  
10 weren't giving it to me, so how else am I supposed  
11 to get my money back?" Because he had told me one  
12 thing and then my dad and I would talk now and  
13 then, so it would have been after that meeting.

14 Q You testified that you talked to  
15 your mother about the meeting you had in the hotel  
16 room with Anson sometime between -- within a month  
17 of the meeting occurring --

18 A Within, I would say, within -- less.

19 Q Did you talk to your father about  
20 that meeting?

21 A Yes.

22 Q When did you speak to your father?

23 A Right around that same --

24 Q And what did you tell him?

1 the details, no.

2 Q Do you remember any of the details?

3 A No.

4 Q Do you remember a meeting in the  
5 fall of '97, around the end of the season?

6 A Yes.

7 Q And during that meeting, did Anson  
8 again speak to you, if your need to contribute to  
9 the team?

10 A Yes.

11 Q And during that meeting did he -- do  
12 you remember him talking to you about the team  
13 academics, fitness and team chemistry?

14 A Yes.

15 Q What, at that time, did he say about  
16 academics?

17 A That I was doing better, but I still  
18 needed --

19 Q Get better still, right?

20 A That I had improved a lot from then  
21 to now.

22 Q But you were still not meeting his  
23 standards, were you?

24 A No, I think -- I wouldn't say that.

1 I think he knew that I could be -- I had brought  
2 it up quite a bit. I think he was just trying to  
3 push me to continue in a positive manner with my  
4 grades. He was acknowledging the fact that I had  
5 made the effort, too.

6 Q What did he say about your fitness  
7 or training?

8 A Saying that I needed to focus on  
9 that now, that I still need to continue to  
10 improve. That is what I needed to make any focus  
11 on.

12 Q And did he tell you you were not  
13 meeting his standards for fitness and training for  
14 the team?

15 A I would, yes. I would assume,  
16 because he had asked me to improve.

17 Q And did he mention making a  
18 contribution to the team chemistry?

19 A Yes.

20 Q And what did he say about  
21 contributing to the team chemistry?

22 A That I needed to be a positive life  
23 source.

24 Q And what did you understand that to



1 be?

2 A To continue doing the things that I  
3 was doing. You know, I had girls over for  
4 get-togethers at my house, attending more, and  
5 more of the girls' parties, maintaining a positive  
6 -- you know, I was a cheerleader on the side  
7 lines, and a comforting figure, and, and positive  
8 person, being supportive of teammates, and  
9 everything else.

10 Q During that meeting did Anson tell  
11 you he was considering cutting you from the team  
12 unless you improved your performance in those  
13 areas?

14 A He said he would have to remove me.

15 Q Do you believe that there were  
16 members of the team who were not playing, who were  
17 doing worse than you were doing in academics?

18 A Did I think there were?

19 Q Yes.

20 A I don't know.

21 Q Do you believe that there were  
22 members of the team who were not playing, who were  
23 doing worse than you, in terms of physical  
24 conditioning and fitness? Not worse, equal.

1           Q           Who arranged the time of that  
2 meeting?

3           A           I believe Anson. I don't remember.  
4 I don't know if there is a sign-up list.

5           Q           So you could have arranged the time  
6 on that meeting, couldn't you?

7           A           I don't know.

8           Q           What happened next in the meeting?

9           A           He basically told me that I had not  
10 met at an adequate level and I was no longer to be  
11 a part of the team.

12          Q           And what did he say you had not met  
13 at an adequate level?

14          A           My fitness, my stats, fitness stats  
15 runs together, could even of -- once he told me I  
16 was cut, it just kind of --

17          Q           Did he tell you you were cut at the  
18 beginning of the meeting?

19          A           I don't recall. He just asked me  
20 when my finals were, went into a discussion, I was  
21 cut, kind of shut off from there.

22          Q           So is it your testimony that once he  
23 told you you were cut, you don't remember anything  
24 else about the meeting?

1 know, some of the girls that I had been cut tell,  
2 and they were more inquisitive whether I was okay,  
3 and where my mental state was.

4 Q Do you know whether any of the women  
5 on the team went and spoke to Anson about cutting  
6 you?

7 A Not to my knowledge.

8 Q Did anyone ever come to you and tell  
9 you they had spoken to Anson about cutting you?

10 A No.

11 Q Other than those people, did you  
12 talk to anybody else, before this meeting that you  
13 had --

14 A That is the best of my recollection  
15 at this point in time.

16 Q Now, did you have a meeting with  
17 Dick Baddour --

18 A Um-hum.

19 Q -- Beth Miller, Susan Ehringhaus,  
20 Anson Dorrance, your father.

21 A And myself.

22 Q And you. Was anybody else in  
23 attendance at that meeting?

24 A No, not that I can recall.

1 Q Why was that meeting called?

2 A In reference to how Anson dismissed  
3 me from the team and his manner of doing so.

4 Q I will show you a document that is  
5 marked as Miller Exhibit Number 24. I believe  
6 Beth Miller testified during her deposition that  
7 these were her notes of a meeting between her,  
8 Dick Baddour, Susan Ehringhaus, Craig Jennings and  
9 you.

10 A It is hard to read.

11 MR. VARCHETTO: Just let him ask the  
12 question.

13 THE WITNESS: Okay. Sorry.

14 BY MR. ZIKO:

15 Q What do you remember happening at  
16 that meeting?

17 A There was a discussion -- I had  
18 became upset, and Ehringhaus leaned over and put  
19 her arm on me, asking me if I needed to leave.

20 Q Where did she put her arm?

21 A Can I borrow your arm?

22 MR. VARCHETTO: Yes, but describe it in  
23 words.

24 THE WITNESS: Oh, sorry. She leaned and

1 put her hand on my arm, got close, made eye  
2 contact with me. Asked me if I needed to leave  
3 the room, if this was too hard.

4 BY MR. ZIKO:

5 Q Was that the first thing that  
6 happened?

7 A No. We had been in discussion of  
8 what was going on, and she saw that I was becoming  
9 upset.

10 Q Let me ask you this: Was there one  
11 meeting where all these people were present, or  
12 was there a series of meetings that had different  
13 groups of people present?

14 A To my best recollection, everybody  
15 was --

16 Q There at one time?

17 A Yes.

18 Q So what is the first thing you  
19 remember about the meeting?

20 MR. VARCHETTO: Just so that I -- I don't  
21 want you to be confused.

22 Do you want her to be making  
23 reference to the document --

24 THE WITNESS: Can I read this first?

1 BY MR. ZIKO:

2 Q You can do anything you like.

3 A Because you keep asking me  
4 questions --

5 MR. VARCHETTO: I just wasn't sure if you  
6 were directing questions -- if you wanted her to  
7 see that or not. I wasn't sure.

8 When you are done reading it, he is  
9 going to ask you questions that may or may not  
10 reference that document. So just pay attention to  
11 the question. Don't worry about the document,  
12 unless he asked you about the document.

13 BY MR. ZIKO:

14 Q I think the second page is exactly  
15 like the first page. It is just another copy.

16 A Yes.

17 Q Now, there was a meeting. Where was  
18 the meeting held?

19 A To my best recollection, at  
20 baddour's office.

21 Q And how did the meeting start?

22 A Well, they were surprised that I was  
23 at the meeting, because they had asked for a  
24 meeting with my father.

1 Q And who was surprised?

2 A I would say everybody was surprised  
3 that I was there.

4 Q And how did they register that  
5 surprise?

6 A Facial expression.

7 Q And after that, what happened?

8 A We got into the discussion of things  
9 that have been going on, and I believe I got upset  
10 with him, saying -- when I had brought it up with  
11 him asking me the sexual comments, this meeting  
12 that took place in the hotel room, him getting  
13 upset and saying he never asked that of anybody,  
14 and then, in my frustration, I started crying and  
15 Susan Ehringhaus leans over and asks if I'm okay  
16 and if I can --

17 Q Let me stop you there. You had  
18 previously mentioned that Susan Ehringhaus reached  
19 and touched your arms?

20 A When I became upset.

21 Q So at the time she reached out and  
22 touched your arm, you were crying, is your memory?

23 A Yes. And she asked if I was okay,  
24 and if I needed to leave the room.

1 Q Was anybody else in the room crying?

2 A No.

3 Q And what did you say to her?

4 A I said "No, I will be okay."

5 Q And what happened after that?

6 A Just the meeting went on. It was  
7 them asking me questions, me answering the  
8 questions.

9 Q Do you remember Miss Ehringhaus  
10 saying anything about you didn't have to say  
11 anything you didn't want to, as long as Anson was  
12 in the room?

13 A Yes.

14 Q And you think that was appropriate?

15 A What do you mean by that question?

16 Q Well, I mean, do you think it was  
17 wrong for her to say that to you?

18 A No. I just thought it was kind of  
19 odd that she would say, you know, "You don't have  
20 to say anything if Anson is in the room."

21 Q Because having Anson in the room  
22 didn't make any difference to you, did it?

23 A No.

24 Q During this meeting did you say --



1 did you tell them anything other than in addition  
2 -- strike that.

3 During that meeting, did you tell  
4 them anything about your experience at UNC Chapel  
5 Hill that you haven't testified about today?

6 A I told them about the practices,  
7 stuff that was being said, the stats -- no.

8 Q During that meeting, did you tell  
9 them everything that you testified to today?

10 A To the best of my recollection.

11 Q During that meeting, did you tell  
12 them about the trip to Anson Dorrance's house  
13 where you called him a liar?

14 A I'm not sure if that came up in  
15 discussion. To the best of my knowledge. I  
16 covered the topics that we covered today.

17 Q In the complaint --

18 A This thing?

19 Q Paragraph -- the first amended  
20 complaint, to be more accurate, Page 4.

21 A Okay.

22 Q Paragraph 16 references Anson  
23 Dorrance intentionally and systematically  
24 subjected plaintiffs to quote, "inappropriate

1 1996 and the present, complaints of Dorrance's  
2 inappropriate and harassing conduct were made on  
3 behalf of Plaintiffs to Hooker, Ehringhaus,  
4 Baddour, Miller and Swafford; do you see that?

5 A Yes.

6 Q Is it your testimony that the  
7 complaints that are referenced in Paragraph 40,  
8 alleged sexual harassment, as you have alleged it  
9 in Paragraph 16?

10 MR. VARCHETTO: I'm just going to object to  
11 the form of the question, because she didn't  
12 allege it, I alleged it on her behalf.

13 BY MR. ZIKO:

14 Q With that correction, the  
15 allegations on your behalf -- let me ask it to you  
16 more simply.

17 Do you know of any complaints that  
18 were made to Hooker, Ehringhaus, Baddour, Miller  
19 or Swafford between 1996 and the date this  
20 complaint was filed -- now, it was signed and  
21 served on July 19th, 1999 -- in which anybody  
22 complained about sexual harassment?

23 A Meaning me talking to people or  
24 other people sending correspondence -- I'm still

1 not --

2 Q Let's look at Paragraph 40.

3 A Okay.

4 Q "On numerous occasions between 1996  
5 and the present" --

6 A Yes.

7 Q -- which, for purposes of this  
8 complaint, is 1999, I guess, July 1999,  
9 "complaints of Dorrance's inappropriate and  
10 harassing conduct were made on behalf of  
11 plaintiffs."

12 That would be you and Debbie Keller?

13 A Okay.

14 Q To Hooker, Ehringhaus, Baddour,  
15 Miller and Swafford?

16 A Yes.

17 Q Do you know of any complaints of  
18 inappropriate and harassing conduct that were made  
19 on your behalf?

20 MR. VARCHETTO: Do you understand the  
21 question?

22 THE WITNESS: No. I'm still --

23 MR. VARCHETTO: Tell him you don't  
24 understand.

1 THE WITNESS: What do you mean by stuff  
2 that was --

3 BY MR. ZIKO:

4 Q Do you know what it is to make a  
5 complaint on behalf of somebody?

6 A Yes, but I don't -- I don't know. I  
7 mean, I know I talked to Ehringhaus, but --

8 Q You talked to Ehringhaus -- let me  
9 help you.

10 Your father also wrote numerous  
11 letters to the university; isn't that true?

12 A Yes. Now I understand.

13 Q He complained about you having to  
14 pay the \$400.00, right?

15 A Yes, now I understand.

16 Q He complained about, I think, the  
17 drinking at some point there. He wrote a number  
18 of letters to the university complaining about  
19 things, correct?

20 A Um-hum.

21 Q You testified at the beginning of  
22 this deposition that you went and read those  
23 letters?

24 A Yes. Last night.

1 Q Right, okay. Do you know --

2 A So, yes, I do know that there was  
3 complaints made.

4 Q Were the complaints made about  
5 sexual harassment, as opposed to just complaints  
6 about inappropriate and harassing conduct?

7 A I don't know.

8 MR. VARCHETTO: I'm going to just interject  
9 an objection on the basis that it is calling for a  
10 legal conclusion as to what constitutes sexual  
11 harassment.

12 BY MR. ZIKO:

13 Q Do you know of any complaints made  
14 on your behalf in which people were complaining  
15 about sexual matters?

16 A Can you state that again?

17 Q Do you know of any complaint made on  
18 your behalf, in which people complained that you  
19 were being subjected to questions or comments or  
20 any harassing conduct related to sex?

21 A I still don't understand. I hear  
22 the question, but it is not --

23 MR. ZIKO: Okay. Can you mark this as  
24 Number 25, I think?

1 Prior to you being cut from the soccer team, let's  
2 use that as a time marker, which was the first  
3 part of May, 1998, right?

4 A Okay.

5 Q Prior to you being cut from the  
6 soccer team, other than the conversation you have  
7 encountered with Susan Ehringhaus, do you remember  
8 -- do you know whether anybody made any complaints  
9 on your behalf --

10 A No.

11 Q Related to a sexual matter?

12 A No.

13 Q Do you know, prior to the time you  
14 were cut from the soccer team, whether any  
15 complaints were made on behalf of any other  
16 player, on the UNC women's soccer team, related to  
17 sexual matters?

18 A I don't know.

19 Q Okay. In Paragraph 43, it says that  
20 quote "as a direct result complaints made to  
21 Hooker, Ehringhaus, Baddour, Miller and Swafford,  
22 regarding Dorrance's inappropriate and harassing  
23 conduct, Dorrance wrongfully and without cause  
24 released Melissa from the women's soccer team at

1       UNC in 1998."

2                       Do you see that?

3               A       Um-hum.

4               Q       Do you believe that is true?

5               A       Yes.

6               Q       So, do you believe that Anson  
7       Dorrance lied to you when he told you that he was  
8       letting you go from the soccer team, cutting you  
9       from the soccer team because of your poor  
10      performance, and grades and fitness?

11              A       He was telling me that was his  
12      reasoning.

13              Q       Right. And is it your testimony  
14      that you do not believe that is true?

15              A       No. He had never cut anybody else  
16      from the program, ever. Why would he suddenly now  
17      do it to me?

18              Q       And so the fact that you believe no  
19      one else was ever cut from the program, that is  
20      why you believed he was lying to you, when he  
21      told you he was cutting you for those reasons; is  
22      that right?

23              A       I just think he was doing it, to --  
24      he was covering his position and saying he was

1 giving me his reasons, and those were his reasons.

2 Q Do you think that they were  
3 legitimate reasons?

4 A They are Anson's reasons, it's...

5 Q Do you think they're the reasons  
6 that he really believed in?

7 A I don't know.

8 Q Do you think the fact that you  
9 called him a liar in his own home, after making an  
10 appointment to come and talk to him about  
11 something you don't know about, may have  
12 contributed to his decision to cut you from the  
13 soccer team?

14 A It is possible.

15 Q Did he ever tell you that it was?

16 A No.

17 MR. ZIKO: It's pretty close to 3:00 here,  
18 let me just take a couple minutes to consult  
19 counsel and we will finish up.

20 (Recess.)

21 BY MR. ZIKO:

22 Q During the time that you were a  
23 student at UNC Chapel Hill, did you keep a diary?

24 A Yes.



1 day-to-day events in your life?

2 A No.

3 Q In Paragraph 47 of the complaint,  
4 you alleged that "Dorrance directly, unreasonably  
5 interfered with this soccer program at UNC, and  
6 created an intimidating, hostile environment that  
7 affected their psychological wellbeing."

8 Do you see that?

9 A Yes.

10 Q Have you ever sought psychiatric  
11 care?

12 A No..

13 Q Have you ever visited a  
14 psychologist?

15 A No.

16 Q Have you ever been diagnosed to have  
17 a psychological illness?

18 A No.

19 Q Have you ever visited a physician or  
20 other health care professional to address any  
21 condition in your life that you attribute to the  
22 experiences you had while a student at UNC Chapel  
23 Hill?

24 A Are you referring for psychological?

1           Q       Yes. Let's start with the  
2       pyschological.

3           A       Okay, No.

4           Q       Now, when you were playing soccer at  
5       UNC Chapel, did you have injuries?

6           A       Yes.

7           Q       And you sought a health care  
8       professional for those?

9           A       Yes.

10          Q       And you are not blaming Anson  
11       Dorrance for those injuries, are you?

12          A       No. Meaning he did them? No. I  
13       mean --

14          Q       You testified about something, about  
15       one time, you -- well, at least there is some  
16       evidence in the record, someplace, that at one  
17       time you had a spinal tap when you were at the  
18       university?

19          A       Yes.

20          Q       Anson didn't infect you with  
21       something to require you to have a spinal tap, did  
22       he?

23          A       No.

24       MR. VARCHETTO: That would be a different

1 lawsuit.

2 BY MR. ZIKO:

3 Q How did, in Paragraph 47, Anson's  
4 conduct effect your psychological well-being?

5 A I think I have already stated that  
6 -- I've already stated answers to that in previous  
7 testimony.

8 Q Okay. Now, you had testified  
9 earlier about women on the soccer team who Anson  
10 humiliated --

11 A Um-hum.

12 Q And you testified that you don't  
13 know that they complained to Anson about it; is  
14 that right?

15 A Yes.

16 Q All right. Do you know of any of  
17 them who complained to Anson about it?

18 A Not to my knowledge.

19 Q Okay. During the time that you were  
20 a player -- during the time you were a member of  
21 the UNC Chapel Hill women's soccer team, did you  
22 ever know Anson Dorrance to field the team that  
23 was not the best team available to him at that  
24 time?

1       them, because they were afraid he was going to cut  
2       their playing time?

3               A       They would take their concerns to  
4       Dino.

5               Q       Okay. That is not an answer to my  
6       question. I will ask you that later --

7               A       But that is how it was.

8               Q       Okay. Is there any woman on the UNC  
9       soccer team that told you that they were not  
10      complaining to Anson about the way they were  
11      treating him because they were afraid Anson would  
12      cut their playing time?

13              A       Not to me directly, no.

14              Q       Now you just testified there were  
15      women on the team that would direct their  
16      complaints to Dino; is that right?

17              A       Dino, if something -- Dino was the  
18      safe person to talk to.

19              Q       And do you know of any woman on the  
20      UNC women's soccer team, who went to complain to  
21      William Paladino, the named defendant in this  
22      action --

23              A       Yes.

24              Q       -- about Anson Dorrance's harassment

1 of them?

2 A They were saying -- the girl said  
3 they went to go talk to Dino.

4 Q Which girls?

5 A Oh, Jesus. I would say I was  
6 probably the only one that wouldn't talk -- didn't  
7 go and talk to Dino. The only time I went and  
8 talked to Dino was about the money issue. If  
9 something was wrong, we always went to talk to  
10 Dino.

11 Q Do you know of any woman on the UNC  
12 women's soccer team who went to William Palladino,  
13 to complain that Anson was sexually harassing  
14 them?

15 A I don't recall at this time. It's  
16 been so long. I just -- if you had a problem, if  
17 you were upset, you would go and talk to Dino. If  
18 something was -- if you were uncomfortable with  
19 something, if you didn't like something, Dino was  
20 the one to talk to.

21 Q You would agree with me that playing  
22 soccer for the UNC women's soccer team was a  
23 challenging personal experience, wouldn't you?

24 A Yes.

1           Q       You would agree that playing for the  
2       UNC women's soccer team was a stressful, physical  
3       experience, wouldn't you?

4           A       Sure.

5           Q       You would agree with me, wouldn't  
6       you, that there were lots of reasons to go to talk  
7       to Bill Paladino about experiences on the women's  
8       soccer team, wouldn't you?

9           A       Yes.

10          Q       What I want to know, is do you know  
11       whether any woman on the UNC women's soccer team,  
12       that you know of, ever went to William Paladino,  
13       to complain that Anson Dorrance was sexually  
14       harassing them?

15          A       At this time, not to my  
16       recollection.

17          Q       Do you know of anything that would  
18       jog your memory of that, so you could testify  
19       about it?

20          A       Not at this moment.

21          Q       After the meeting with Anson  
22       Dorrance, where he cut you from the team --

23          A       Uh-huh.

24          Q       -- how many other times have you

1 Q Well, in Paragraph 4 Anson --

2 A Yes.

3 Q Paragraph 47, "Dorrance's conduct  
4 directly and unreasonably interfered with  
5 plaintiff's education."

6 Do you see that?

7 A Yes.

8 Q Okay. After he cut you from the  
9 soccer team, did Anson Dorrance have any  
10 interaction with you that interfered with your  
11 education?

12 A At this point in time, I can't  
13 remember.

14 Q The fact of the matter is that after  
15 he cut you from the team, the only other  
16 interaction you had with Anson Dorrance was at the  
17 meeting with Dick Baddour, and Susan Ehringhaus,  
18 Beth Miller, and your father and Anson Dorrance;  
19 is that right?

20 A To the best of my -- that is where I  
21 know he was at for sure, 100 percent, to the best  
22 of my knowledge.

23 Q Were all the women on the women's  
24 soccer team at UNC Chapel Hill, drinkers of

1           A           No. Sorry. I misunderstood.

2           Q           On Paragraph 21, Page 5, "on  
3 repeated occasions from 1994 to 1998," et cetera,  
4 et cetera, "uninvited physical contact by touching  
5 her on various parts of her body."

6                       Do you see that?

7           A           Um-hum.

8           Q           Is the antecedent of her, Debbie, in  
9 Paragraph 20?

10          A           Antecedent, the person?

11          Q           Does "her" refer to Debbie?

12          A           Yes..

13          Q           Okay. It doesn't refer to you, does  
14 it?

15          A           No.

16          Q           So you are not alleging that  
17 Dorrance used his position to make inappropriate  
18 uninvited physical contact by touching you, are  
19 you?

20          A           No.

21               MR. ZIKO: I don't have anymore questions.

22               MR. VARCHETTO: Okay. I just have a  
23 couple.

24